Document Log Item

Addressing			
From		**To**	
"Conlan, Linda" <Linda.Conlan@amec.com>		Carmen Santos/R9/USEPA/US@EPA	
CC		**BCC**	
Patrick Wilson/R9/USEPA/US@EPA			
Description			Form Used: Memo
Subject		**Date/Time**	
RE: PCBs: Pechiney - Next Steps		02/08/2010 12:17 PM	
# of Attachments	**Total Bytes**	**NPM**	**Contributor**
2	2,294,848		
Processing			
Comments			

Body

Document Body

Carmen;

Sorry for the delayed response; I was out of the office most of last week without email access. We are putting together our response to the first and second set of questions and some of the additional questions noted below. We should be able to provide our responses by early next week, if not sooner.

The QAPP is found in Appendix D of the application. For reference, attached is a PDF version of the QAPP (excluding the laboratory manuals in order to reduce the file size from 25M to 2M). The excavation sampling plan and perimeter air monitoring plan are presented in Appendix B and C of the attached QAPP. Also, your Geologist is correct with respect to the wind direction being predominantly east; I stated the direction incorrectly as "westerly" during our last call. Our air monitoring plan and monitoring stations are based on the South Coast Air Quality Management District 1981 annual windrose for Vernon(see attached file).

Regards,

Linda

From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]
Sent: Thursday, February 04, 2010 5:09 PM
To: Conlan, Linda
Cc: Wilson.Patrick@epamail.epa.gov
Subject: PCBs: Pechiney - Next Steps

Hello, Linda:

Thank you for the time that you, Todd, and Calvin dedicated to our conference call to share information and respond to questions.

After reviewing my notes, I believe Geomatrix's written responses to the first and second sets of questions that I sent via e-mail message may provide some of the clarifications that we are seeking on the Pechiney Application. Such clarifications will help in drafting the conditional approval.

Please let me know by when could Geomatrix provide written responses to the first and second sets of questions via e-mail message.

Please also clarify if the cleanup party plans on capping (e.g., paving) the site before redevelopment or is it the intent to leave completely exposed at the surface (0 to 5 feet bgs) the crushed PCB-contaminated concrete / soil mixture containing 5.3 ppm PCBs or less? We need a firm clarification on this issue.

Based on our geologist review of the Application, Geomatrix should double-check its assumptions about wind direction. A 1981 annual wind rose for Vernon, Californiashows the wind direction almost entirely east (i.e., ocean breezes blowing from west to east). It may be worthwhile for Geomatrix to develop a season-specific windrose for the site for the time frame they anticipate performing the concrete crushing activity so Geomatrix can better place air monitoring instruments.

Please let me know where in the 579-page QAPP we can find the site-specific air monitoring plan and site-specific soil / concrete sampling plan. We were not able to find those plans within such large document.

Finally, please confirm the party that currently owns the Pechiney property.

Thank you.

Sincerely,
Carmen

Carmen D. Santos, Project Manager
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
415.972.3360
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----- Forwarded by Carmen Santos/R9/USEPA/US on 02/04/2010 03:23 PM -----

From: Carmen Santos/R9/USEPA/US

To: Linda.Conlan@amec.com

Cc: Patrick Wilson/R9/USEPA/US@EPA

Date: 01/27/2010 11:43 AM

Subject: PCBs: Pechiney - 2nd Set of Questions

Greetings, Linda:

Thank you for setting up a conference call number for our call on Friday January 29, 2010 Below is the second set of questions that I have on the Pechiney Application.

1. What is the justification for the number of soil samples to be collected beneath PCB-impacted concrete and sampling grid used to arrive to the number of samples? What is the rationale for the number of samples proposed in the table included in Section 61.1.3?

2. What is the justification for the number of bulk concrete samples proposed to determine the concentration of PCBs in concrete that will be crushed for disposal on site? What is the rationale for the sampling grid that will be used for collection of these concrete samples? Recently, USEPA provided to AMEC Geomatrix the SOP for sampling porous surfaces (such as concrete)

3. The Application indicates that areas of concrete assumed not to be associated with former PCB related activities are assumed to have PCB concentrations below the risk based soil levels calculated in the Application and that such concrete can be crushed and used on site as fill. Preliminarily, we do not agree with this assumption and request that use of crushed concrete at the site be supported by PCB analysis of a reasonable and representative number of concrete samples collected from concrete not yet tested for PCBs.

4. Except for Building 114, USEPA has not been involved with sampling, investigatory, and removal activities conducted to date at the Pechiney site. Does the Pechiney facility encompass Building 114?

5. What is the PCB concentration of soils deeper than 15 feet at the Pechiney site? What are the plans for these soils if PCBs are present?

6. In Section 5.2 of the Application the following PCB remediation goals are proposed: 5.3 mg/kg PCBs for soils to be left exposed at the surface (upper 5 feet), a 35 mg/kg PCBs for soils that will be 5 feet below crushed concrete that contains PCBs below 5.3 mg/kg, and a 5.3 mg/kg PCBs for concrete that may be demolished, crushed, and disposed onsite as fill. However, Section 5.6.1 (Demolition and Disposal of PCB-impacted Concrete) of the Application states that "PCB-impacted concrete slab areas where concentrations exceed the proposed site-specific remediation goal of 5.3 mg/kg and 50 mg/kg will be demarcated in the field by marking the slab surface." Section 5.2 of the Application does not refer to a 50 mg/kg remediation goal. Please reconcile this apparent inconsistency.

7. Section 6.1.2 (Surface./Shallow PCB Impacted Soil Remedial Action Implementation) states that "[t]his remedy will be implemented after below-grade demolition of surface slabs and pavements, utilities and pipelines, pits, sumps, and other deeper structures is complete." Please explain which section of the Application responds to the issues raised by USEPA in Items 4 through 7 of its October 6, 2006 letter disapproving Geomatrix's September 27, 2006 self implementing PCB cleanup notification. For example, Item 6 in the attached USEPA letter makes reference to galbestos and potential PCB contamination in soil due to potential deterioration of galbestos. Attached is the electronic file (pdf) containing a copy of USEPA's letter.

8. Please explain what measures will be taken onsite to prevent worker and public exposure to dust that may be potentially generated during crushing of PCB-contaminated concrete planned for use onsite.

9. If available, please provide detailed information on the redevelopment plans for the facility. We want to have a clearer understanding of all the land use projects the City of Vernonhas approved for the Pechiney site and potential exposure pathways upon redevelopment of the facility.

10. In what manner are the exposure scenarios used in Sections 4.0 to 6.0 of the Application consistent with or more protective than the exposure scenarios assumed for high and low occupancy areas as those areas are defined under Section 761.3 of the TSCA regulations.

I may have additional questions later.

Thank you for your courtesies. I look forward to our conference call on Friday January 29, 2010 at 10:30 AM.

Sincerely,

Carmen D. Santos, Project Manager
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- PCB Notification Plan - Appendix D_reduced.pdf

- 1981 Windrose_SCAQMD.pdf